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PRINCIPLES OF MILITARY OPERATIONS OTHER THAN WAR AS APPLIED TO THE UNITED NATIONS OPERATION IN SOMALIA II

by

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A paper submitted to the Faculty of the Naval War College in partial satisfaction of the requirements of the Joint Military Operations Department.

The contents of this paper reflect my own personal views and are not necessarily endorsed by the Naval War College or the Department of the Navy.

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15.Abstract: IN APRIL 1992, THE UNITED NATIONS ESTIMATED THAT 4.5 MILLION SOMALISNEARLY 65 PERCENT OF THE COUNTRY'S POPULATIONREQUIRED EXTERNAL ASSISTANCE. LATER THAT MONTH, THE UNITED NATIONS SECURITY COUNCIL APPROVED RESOLUTIONS TO PROVIDE HUMANITARIAN AID AND FACILITATE THE END OF HOSTILITIES IN SOMALIA. THE SCOPE OF U.S. MILITARY INVOLVEMENT IN SOMALIA IS DISCUSSED, OUTLINING THE DIFFERENCES AMONG THE THREE DISTINCT PHASES KNOWN AS THE UNITED NATIONS OPERATION IN SOMALIA I (UNOSOM I), UNITED TASK FORCE (UNITAF), AND UNITED NATIONS OPERATION IN SOMALIA II (UNOSOM II). ALTHOUGH MUCH HAS BEEN WRITTEN ON ALL THREE OPERATIONS, THIS PAPER WILL FOCUS PRIMARILY ON UNOSOM II. WITH REPORTS THAT SOMALIA HAS LARGELY REVERTED TO ITS PRE-INTERVENTION STATE WITH NO VIABLE GOVERNMENT AND CLANS RESORTING TO VIOLENCE TO GAIN POWER, THERE IS LITTLE EVIDENCE TO SUGGEST THAT SUCCESS WAS ACHIEVED IN SOMALIA DURING UNOSOM II. IN JANUARY 1993, FOUR MONTHS BEFORE THE FORMAL TRANSFER OF COMMAND FROM UNITAF TO UNOSOM II, THE CENTER FOR ARMY LESSONS LEARNED PUBLISHED A PRIMER ON SOMALIA THAT INCLUDED A DETAILED OUTLINE OF THE EMERGING DOCTRINE FROM FM 100-5: PRINCIPLES OF MILITARY OPERATIONS OTHER THAN WAR (MOOTW). THIS PAPER WILL EXPLORE THE EXTENT THAT EACH PRINCIPLE OF MOOTW WAS APPLIED TO UNOSOM II AND SEEK TO DETERMINE IF THE COLLAPSE OF THAT OPERATION RESULTED FROM A FAILURE TO INCORPORATE THE EMERGING DOCTRINE.			
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INTRODUCTION

Somalia's difficulties began shortly after Northern Somalia achieved independence from the United Kingdom and Southern Somalia from Italy in July 1960.¹ The unification of the North and South was followed by internal power struggles, war with Ethiopia, and years of sporadic civil war that produced images of anarchy and famine that were broadcast around the world from Somalia. "By April 1992, the United Nations estimated that 4.5 million Somalis--nearly 65 percent of the country's population--required external assistance." Of those, an estimated 1.5 million were considered to be imminently at risk of starvation. Later that month, the United Nations Security Council (UNSC) approved Resolution 751, the purpose of which was "to provide humanitarian aid and facilitate the end of hostilities in Somalia." Three months after their mission was authorized, in August 1992 the first U.N. military observers were finally in place. In the meantime, internecine clan warfare raged and conditions for the populace continued to deteriorate, prompting humanitarian organizations to launch a coordinated international appeal for help in Somalia.⁴

The scope of U.S. military involvement in Somalia will be discussed in the following portion of this paper, outlining the differences among the three distinct phases known as the United Nations Operation in Somalia I (UNOSOM I), United Task Force (UNITAF), and United Nations Operation in Somalia II (UNOSOM II).

Although much has been written on all three operations, this paper will focus primarily on UNOSOM II. Regarding UNOSOM II, Colonel Harry G. Summers Jr. wrote: "The fiasco in Somalia turned public and congressional opinion dramatically against "peacekeeping" operations." The Chairman of the Joint Chiefs of Staff, General John M. Shalikashvili, affirmed that Somalia was not a "core interest" to American long term security and he could

not imagine further intervention by anyone in Somalia.⁶ With reports that the country has "largely reverted to its pre-intervention state with no viable government and warlords resorting to violence to gain individual power," there is little evidence to suggest that success was achieved in Somalia during UNOSOM II.⁷

In January 1993, four months before the formal transfer of command from UNITAF to UNOSOM II, the Center for Army Lessons Learned published a primer on Somalia that included a detailed outline of the emerging doctrine from FM 100-5: Principles of Military Operations Other Than War (MOOTW).8

This paper will explore the extent that each principle of MOOTW was applied to UNOSOM II and seek to determine if the collapse of that operation resulted from a failure to incorporate the emerging doctrine.

BACKGROUND

UNOSOM I

When Resolution 751 was adopted on April 24, 1992 the U.N. Security Council established the United Nations Operation in Somalia (UNOSOM I), "providing for the immediate dispatch of 50 unarmed U.N. observers to monitor a tenuous cease-fire" between warring factions. Early in May, the Special Representative for Somalia, Mr. Mohamed Sahnoun arrived in Mogadishu to meet with clan leaders and "arrange for the arrival of cease-fire observers, pursue consultations about deployment of an armed security force of 500 peacekeepers to protect relief operations, and coordinate a stepped-up humanitarian assistance program nationwide." However, fulfilling all of those tasks proved difficult, and

factional fighting continued while the humanitarian emergency deepened. 11

Pakistani Brigadier General Imtiaz Shaheen finally arrived on July 5, 1992 to serve as the U.N. military chief, 50 observers followed two weeks later and initial elements of the armed Pakistani security force arrived in mid-September. U.S. military involvement was initiated in late August as Operation Provide Relief was launched from Mombasa, Kenya, airlifting humanitarian supplies and Pakistani peacekeepers to Somalia. 12

Despite the efforts of numerous relief organizations, the demand for food and medicine outstripped what could be supplied to needy Somalis. Lawlessness and violence continued in Mogadishu, and looting of relief convoys was almost routine. It became clear that the security force of 500 light infantry soldiers without artillery, heavy weapons or air support, would be far too small and ill-equipped to deal with the situation. U.S. Central Command and the JCS began to define a mission to ensure the safe delivery of relief supplies to famine-stricken areas, with the initial plan indicating that a force of 12,000 to 15,000 would be required for effective security; using U.S. troops was still not envisioned. By mid-November, the situation in Somalia had become perilous. The international news media focused on fatigued relief workers who were unable to deliver food to thousands of dying Somalis, putting intense political pressure on the Bush administration to intervene with U.S. forces. In the contract of the supplies to family the supplies to famil

UNITAF

On December 3, 1992, the crisis in Somalia was once again addressed by the United Nations. On that date, the U.N. passed UNSC Resolution 794 which approved U.N. military

action in response to President Bush's offer "to assume leadership of a U.N. coalition to establish a secure environment for the delivery of humanitarian assistance." The resulting operation, known as the Unified Task Force (UNITAF), was code-named Operation Restore Hope by the United States. UNITAF comprised "U.S. and allied troops under the command of Lieutenant General Robert Johnston, who in turn reported to General Joseph P. Hoar, Commander in Chief, U.S. Central Command (CINCCENT)." To fulfill the need for an active political presence to balance the military aspects of Operation Restore Hope, the President appointed a former ambassador to Somalia, Robert B. Oakley, as special envoy to oversee all U.S. civilian activities in Somalia and "provide political advice to UNITAF." 20

Although the operation was now led by the U.S., a close dialogue was maintained with the U.N. Special Representative Mr. Ismat Kittani (who was appointed after Mr. Sahnoun resigned in October) and General Shaheen, military commander of UNOSOM I.²¹

Much larger than UNOSOM I, UNITAF involved more than 38,000 troops from 21 coalition nations, including 28,000 Americans.²² The objectives as set forth by U.S. Central Command were: to secure major air and sea ports, key installations and food distribution coalitis; to provide security for convoys and relief organization operations; and to assist nongovernmental organizations (NGOs) in providing humanitarian relief under U.N. auspices.²³ UNITAF would "bridge the gap until the situation stabilized enough for it to be turned over to a permanent U.N. peacekeeping force."²⁴

As UNITAF's forces spread into central and southern Somalia, looting, extortion, and attacks on relief workers declined sharply and supplies arriving in Mogadishu could be safely transported by convoy to inland towns.²⁵ By April, there were many indications within

Mogadishu and throughout the country that UNITAF was succeeding in its mission. Schools began to reopen, thousands of Somalis had apparently been spared from famine and disease, clan skirmishes were infrequent and the open display of weapons by local inhabitants was rarely observed.²⁶ As planned, UNITAF began to coordinate the return of the operation to the United Nations.

UNOSOM II

Under UNSC Resolution 814, UNOSOM II was established with an enhanced mission that included responsibility for "the consolidation, expansion and maintenance of a secure environment throughout Somalia" and emphasized the "crucial importance of disarmament" of organized factions.²⁷

Admiral Jonathon Howe, U.S. Navy, retired, was appointed as the new U.N. Special Representative and christened this third phase as Operation Continue Hope.²⁸ While the U.N. mission had been expanded from peacekeeping during UNOSOM I, (cease-fire monitoring) to peace enforcement under UNOSOM II, (compelling compliance with Resolution 814 while emphasizing factional disarmament), combat power had been significantly reduced. Only 17,200 troops of a proposed 28,000 were assigned in Somalia at the outset. Of the 4,000 total U.S. personnel, combat forces consisted of 1,300 soldiers from the U.S. Army's Tenth Mountain Division, who made up the Quick Reaction Force (QRF).²⁹

On May 4, 1993, as envisioned by the UNITAF mission statement, command of the operation was formally transferred back to the United Nations with Turkish Lieutenant General Cevik Bir as commander.³⁰ Serving as General Bir's deputy was Major General

Thomas Montgomery, U.S. Army, who was also assigned as Commander, U.S. Forces, Somalia (USFORSOM).

The leader of the Somali National Alliance (SNA), Mohammed Farrah Aideed, resisted U.N. intervention from the outset and recognized "the significantly weaker force structure" as an opportunity to "take advantage of the transition to UNOSOM II." On June 5, 1993, Pakistani units returning from a scheduled inspection of Aideed weapons storage cantonments were ambushed, suffering 25 killed, 53 wounded, and 10 missing in action. 32

The following day, the UNSC adopted Resolution 837, allowing UNOSOM II to "take all necessary measures against those responsible for the attack," and on June 17, Admiral Howe formally announced that a \$25,000 award had been posted for information leading to Aideed's arrest.³³

During the following two months, escalating armed confrontation ensued between UNOSOM II forces and armed elements of the SNA. Mortars, rocket-propelled grenades, snipers, mines and ambushes were effectively employed by Aideed's forces to inflict casualties on U.N. coalition personnel.³⁴ Responding to increasing U.S. losses and repeated requests by Admiral Howe, the Clinton administration deployed Joint Task Force (JTF) Ranger to Mogadishu, with orders to apprehend Aideed and senior SNA officials.³⁵

JTF Ranger was commanded by Major General William Garrison of the Joint Special Operations Command who reported directly to General Hoar, CINCCENT. The UNOSOM II force commander and his deputy had veto authority over all JTF Ranger missions, but were given only 30-minute notification proper to any raid. 36

Disaster struck on October 3, when a daylight assault on the Olympic Hotel in central

Mogadishu erupted into a firefight that lasted into October 4, resulting in 18 Americans dead and 84 wounded.³⁷ Two days later President Clinton personally ordered the halt of any further action by U.S. forces against Aideed, and the following day announced that U.S. policy would again focus on political reconciliation among Somali factions.³⁸ Despite the announcement that additional combat personnel and heavy armor would be deployed as security, Aideed and the SNA were thrilled with the change in U.S. policy and declared a unilateral cease fire.³⁹

On March 25, 1994, all U.S. combat units departed Somalia, leaving an international force of approximately 20,000 that included a few hundred Americans who remained until September, functioning in support roles. UNOSOM II slowly lost its ability to provide protection for NGOs while it increasingly focused on self-protection and withdrawal. U.S. Central Command was tasked to provide security for all forces participating in the final withdrawal, and the last UNOSOM II forces left Somalia on March 3, 1995.

THE DOCTRINE

PRINCIPLES OF MILITARY OPERATIONS OTHER THAN WAR

OBJECTIVE. Direct every military operation toward a clearly defined, decisive, and attainable objective.

UNITY OF EFFORT. Seek unity of effort in every operation.

SECURITY. Never permit hostile factions to acquire a military, political, or informational advantage.

RESTRAINT. Apply appropriate military capability prudently.

PERSEVERANCE. Prepare for the measured, protracted application of military capability in support of strategic aims.

LEGITIMACY. Committed forces must sustain the legitimacy of the operation and of the host government, where applicable.⁴¹

PRINCIPLES APPLIED TO UNOSOM II

The following analysis examines the six principles of MOOTW and the extent to which they were applied during UNOSOM II.

OBJECTIVE. Approval of UNSC Resolution 814, mandated UNOSOM II as a Chapter VII (peace enforcement) mission with the objective of expanding and maintaining a secure environment throughout Somalia, while emphasizing the "crucial importance of disarmament." Following the ambush on Pakistani soldiers, the UNSC passed Resolution 837 on June 6, 1993, authorizing "all necessary measures against those responsible" for the attack, including their "arrest and detention for prosecution, trial and punishment."

OBSERVATIONS. The objectives presented in UNSC Resolution 814 were recognized as unprecedented, "with no example other than the one that was about to be set," and the most far-reaching program that the U.N. had embarked upon to date.⁴⁴ The terminology used in Resolution 814 did not lend itself to a clear definition of security within Somalia when measured against "the crucial importance of disarmament." Exactly who was to be disarmed was left to the interpretation of "the field leadership of UNOSOM II without adequate planning or resources."

Under Resolution 837, the objective was focused on the effort to arrest Aideed who had been determined by a U.N. expert consultant to be the one responsible for the Pakistani ambush.⁴⁶ Admiral Howe, who maintained a steady official dialogue with the secretary-general as well as an unofficial one with the Clinton administration, didn't foresee impending problems with the course of action to arrest Aideed.⁴⁷ The UNOSOM II

commander and his deputy felt that it was appropriate, but that a reward of \$25,000 was too low.⁴⁸

After JTF Ranger deployed to Mogadishu, the capture of Aideed became the measure of mission success. The Rangers "became a posse with standing authority to go after Aideed." The lack of coordination with other forces, due to JTF Ranger operational security practices, failed to contribute to the coalition's unity of effort.

Under UNSC Resolution 837, political guidance was translated into military objectives that indirectly still supported the original objectives of UNSC Resolution 814, but at an increased risk to national prestige and American lives. The Ranger raids served to undermine the legitimacy of coalition presence in the eyes of the Somalis when "scores of Somalis, including not only some senior SNA officials but also many uninvolved Somalis and even some foreign relief workers," were arrested. Quoting the Under Secretary of Defense for Policy, Frank Wisner: "The single most serious flaw in our policy was that we tried to accomplish political objectives solely by military means." 51

UNITY OF EFFORT. As mentioned earlier, the political leader during UNOSOM II was the U.N. Special Representative, Admiral Howe. Reporting to him was the UNOSOM II commander, Lieutenant General Bir, who commanded all coalition forces in the country except those from the United States. Americans were under the command of Major General Montgomery, who also served as the UNOSOM II deputy commander. As second in command of the operation, Montgomery reported directly to General Bir. As Commander, USFORSOM, however, Montgomery's immediate superior was General Hoar, CINCCENT.

JTF Ranger, commanded by Major General Garrison, also reported to General Hoar, leaving the Commander, USFORSOM, without operational control of a sizeable portion of the force that was conducting operations in the city of Mogadishu. Similarly, the 1,300 soldiers comprising the QRF also remained under the operational control of CINCCENT.⁵²

OBSERVATIONS. The complex nature of the command structure for U.S. forces caused concern for some coalition nations, particularly on the part of the French and Italians, who "alleged a lack of adequate consultation, planning, and advance notification by UNOSOM II of military operations in Mogadishu." When the Rangers arrived on the scene in August, they functioned virtually independently of all other units.

Disagreements on objectives also affected the unity of effort. The Italians were not in agreement with the policy to apprehend Aideed, and after four of their soldiers were killed in early July, the Italian military command "indicated that it would instead take orders from Rome." The QRF, in place to provide rapid combat power "in situations that exceeded the capability of UNOSOM II forces," remained under operational control of CINCCENT rather than General Bir and Admiral Howe. 55

SECURITY. The principal military threat posed to UNOSOM II units was the SNA led by Mohammed Farrah Aideed. Aideed previously held the rank of General in the Somali army, and was trained by the French.⁵⁶ The U.S. QRF was in place to provide additional force security, countering SNA militia in the event coalition forces required increased combat power for self-defense. A formal request for armor to back up the QRF was made in mid-September by Major General Montgomery, USFORSOM, who stated: "I believe that

U.S. forces are at risk without it."57

When JTF Ranger deployed to Somalia in August, AC-130 aircraft that were normally part of the force package, were not included.

OBSERVATIONS. Outside of Mogadishu, UNOSOM II forces experienced considerable freedom of action in Somalia, but increasingly frequent attacks on units inside the city, made it apparent that the military capabilities of the SNA had been underestimated. Aideed maintained contact with allies who were positioned in the UNOSOM II headquarters and he "managed to keep abreast of tactical plans." 58

The request for armor was disapproved by Secretary of Defense Les Aspin because the "U.S. policy in Somalia was to reduce its military presence and its role in UNOSOM II, not increase it."⁵⁹

The concern over negative press coverage may have been the basis for not sending AC-130s with JTF Ranger.⁶⁰ During a previous AC-130 deployment in June to Mogadishu, CNN coverage documented the destruction of several SNA-controlled buildings, showing considerable collateral damage.⁶¹ The decisions not to deploy armor and AC-130 gunships left UNOSOM II forces without the ability to demonstrate an overwhelming show of U.S. force to support its operations, thus increasing the likelihood of hostile attacks. At the same time, the nature of movement in an urban area put surprise on the side of organized factions.

Aideed was able to gain a local political advantage by exploiting the presence and actions of foreign troops through radio addresses in which he warned that the U.N. was planning to turn Somalia into a "trusteeship under Governor Howe."

RESTRAINT. Throughout UNOSOM II, there remained a high level of contact between coalition forces and the Somali populace. Numerous incidents of stone throwing and attempted thievery that could have been interpreted as life threatening by fighting men resulted in appropriate non-lethal use of force. "It showed that well-trained soldiers without any specialized peacekeeping training can use good judgement to make split-second decisions on when to fire weapons." At the same time, the rules of engagement (ROE) were liberalized to provide for "engagement without provocation of crew served weapons and organized, armed militias that were considered a threat to UNOSOM II forces."

Pursuant to UNSC Resolution 837, an aggressive manhunt for Aideed and other SNA officials ensued.

OBSERVATIONS. With emphasis on disarmament of factions and incorporation of enhanced ROE, tensions were running high between militias and UNOSOM II. Following the adoption of Resolution 837, a series of attacks that served to antagonize the SNA were conducted against weapons storage sites and radio broadcasting facilities. Even though efforts were made to ensure ample warning was given prior to these attacks, collateral damage was inflicted on some civilians and nearby buildings, allowing Aideed to manipulate media coverage, influencing public opinion to believe that the force was excessive. 66

When the Rangers were pinned down on October 3-4, their forces and the QRF/coalition rescue team inflicted casualties estimated at 500-1,000 Somalis killed or wounded.⁶⁷ It should be noted that a common tactic for Aideed gunmen was to mingle in mobilized crowds of women and children, making it impossible for troops to protect themselves without killing civilians.⁶⁸

PERSEVERANCE. The objectives as set forth in Resolution 814 were recognized to be some of the most aggressive in the history of the United Nations. The U.S. affirmed and pledged to "vigorously support" the mission with full knowledge that it was a nation-building exercise as well as a peace enforcement mission. U.S. troops committed in Somalia were reduced from 28,000 during UNITAF to approximately 4,000 for UNOSOM II.

OBSERVATIONS. As the objectives for UNOSOM II evolved from expanding and maintaining security throughout Somalia to conducting military operations within Mogadishu to arrest Aideed, U.S. policy was inconsistent with a long term commitment to the operation. Secretary of Defense Aspin pointed out that the policy at that time was to reduce U.S. involvement in the operation.

Casualties mounted as offensive military action was undertaken against the SNA, prompting the American public and Congress to question U.S. involvement. However, on September 22, the UNSC unanimously adopted Resolution 865 that reaffirmed all previous resolutions on Somalia. Unfortunately, there still was not a coherent strategy that integrated military objectives with clear political objectives.

After the Ranger disaster on October 4, U.S. policy was immediately changed to reflect one of political reconciliation exclusively. U.S. military commanders were ordered to cease further action except in self-defense. The new U.S. policy also included March 1994 as a firm departure date for U.S. forces.

Recognizing that UNOSOM II could not continue with its original mandate without U.S. participation, a number of resolutions were passed that suspended the arrest warrant on Aideed, revoked the peace enforcement provisions of Resolution 814, prohibited coercive

LEGITIMACY. Following the apparent success of UNITAF, the international community and American public did not question the continued U.N. involvement in Somalia. The legality of the peace enforcement mission and effort to apprehend Aideed was provided for by the adoption of UNSC Resolutions.

Despite the resolutions, the SNA undoubtably viewed the continued intervention as an effort to wrest away their power in Somalia, in light of the new emphasis placed on factional disarmament and particularly after the arrest warrant was issued on Aideed under Resolution 837.

OBSERVATIONS. The manner in which the U.N. mandates were interpreted and implemented rapidly led to confrontations with various factions, but primarily with the SNA. "UNOSOM II quickly reached judgments on the avenues of political reconstruction it considered appropriate for Somalia, backed the factions that supported them, and asserted its readiness to employ coercion if thwarted." When UNOSOM II troops experienced increasing numbers of killed and wounded, contributing nations had disagreements on coalition objectives, significantly eroding support for the action.

The course of action under Resolution 837 exacerbated negative perceptions of the operation not only in Somalia, but also in the U.S. and other countries, while public information activities associated with UNOSOM II "took a simplistic anti-Aideed line to justify their operation."⁷⁵ The culminating point for U.S. support came after October 4, when the media broadcast horrible images of gleeful Somalis desecrating the remains of a

U.S. soldier and displaying the bloodied face of a captured American helicopter pilot.

CONCLUSIONS

An examination of the principles of MOOTW applied to UNOSOM II along with relevant observations indicates that those principles were not applied properly, although MOOTW doctrine had been promulgated by the Center for Army Lessons Learned four months prior to the commencement of the operation.

Objectives were not well defined at the outset, resulting in an interpretation that led commanders to focus solely on military solutions, with goals skewed toward what were perceived as achievable.

The interrelationship among the principles of MOOTW does not lend itself to a strictly defined interpretation of the shortcomings under each principle, but rather to a consideration of the cumulative effect various failures can have on a single principle that will bring about the termination of an operation. In the case of UNOSOM II, that principle was *legitimacy*.

The UNOSOM II political and military leadership viewed Aideed as an impediment to the mandates as set forth in UNSC Resolution 814, and JTF Ranger was considered essential in order to successfully arrest Aideed under the provisions of Resolution 837. Offensive military action by JTF Ranger antagonized the SNA, and Aideed manipulated the media to successfully portray the U.S. use of force as excessive. His skillful use of local radio addresses served to dissolve coalition legitimacy in the eyes of the Somali people and facilitated acts of violence against U.N./U.S. forces during the battle that took place during October 3-4.

When JTF Ranger began the all-out hunt for Aideed in August, other nations became increasingly alienated from the operation resulting in doubts regarding the correctness of the chosen course of action. The separate military chain of command that was in place for U.S. forces, combined with increased offensive actions undertaken to capture Aideed, eroded the coalition's unity of effort and ultimately affected the legitimacy of UNOSOM II.

Refusal to send armor or AC-130 gunships to Mogadishu affected the security of deployed forces. The inability to respond with overwhelming firepower from the air or mass an effective armored force to mount a rescue, resulted in heavy American casualties. To the American public, the losses suffered by their soldiers appeared to serve no legitimate purpose and galvanized opinion against further military action.

The ability of UNOSOM II to persevere under the original peace enforcement guidelines of Resolution 814 was dependant upon U.S. military involvement. March 1994 was established as the formal withdrawal date for American troops subsequent to the public outrage in response to the tragedy on October 3-4; however, a policy to reduce U.S. involvement in Somalia was already in effect at the time of the failed raid. That would indicate that the U.S. had already concluded that UNOSOM II was not envisaged as a legitimate operation in view of long-term national security interests.

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- 61. Ibid.
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